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October 12, 2022

VIA CM/ECF

The Honorable Judge Christine P. O' Hearn
Mitchell H. Cohen Building & U.S. Courthouse
4th & Cooper Streets, Room 1050
Camden, New Jersey 08101

**Re: Gandy et al. v. City of Millville, et al.
Civil Action No. 1:20-CV-641-CPO-AMD**

Your Honor:

As you may be aware, this firm represents Plaintiffs the Estate of Edward C. Gandy Jr. and Shane S. Gandy ("Plaintiffs") in the above referenced matter. Plaintiffs' current deadline to produce expert reports is October 17, 2022. However, Plaintiffs have been seeking the deposition of a key witness for months now, and it was finally scheduled for that same day, October 17, 2022. This deposition will be crucial for Plaintiffs' expert witness, and as such Plaintiffs will need time to get the transcript, send it to their expert, and have their expert have some time to incorporate it into the report, to the extent necessary. Further, the Court's decision today on the motion to dismiss changes the nature of Plaintiffs' medical expert report, and as such Plaintiffs' expert will need time to adjust. As such, Plaintiffs respectfully request that the deadline to file expert reports be extended until November 7, 2022, which is a week after the upcoming case management conference and will allow for any issues to be addressed at that conference. I have the consent of the City defendants' counsel but have not heard back from Inspira's counsel. Thank you for your time and consideration, and please feel free to have a member of your staff contact me with any questions or concerns.

Respectfully,
SMITH + SCHWARTZSTEIN LLC

/s/ Andrew Smith
By: _____
Andrew B. Smith, Esq.

cc: Counsel of Record